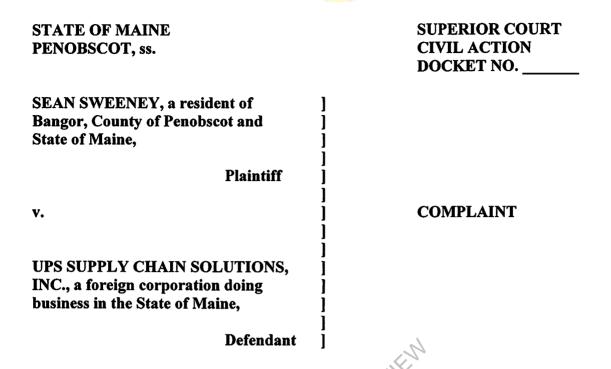
EXHIBIT A



Sean Sweeney, through his attorney, Brett D. Baber, Esq. of Lanham Blackwell & Baber, submits the following complaint against UPS Supply Chain Solutions, Inc.:

- 1. Plaintiff Sean Sweeney is a resident of Bangor, County of Penobscot and State of Maine.
- 2. Defendant UPS Supply Chain Solutions, Inc. (UPS) is a foreign corporation doing business in the State of Maine.
- 3. Plaintiff Sweeney brings this action pursuant to 5 M.R.S. §§4571-4572(1)(A) and (2) of the Maine Human Rights Act.
- 4. Plaintiff Sweeney has exhausted his administrative remedies by pursuing a complaint of discrimination to conclusion at the Maine Human Rights Commission.
 - 5. Plaintiff Sean Sweeney has been employed by Defendant UPS since 1993.

- 6. Plaintiff Sweeney has been diagnosed with "Attention Deficit Hyperactivity Disorder" which constitutes a "disability" under the Maine Human Rights Act.
- 7. From time to time since 1993, Plaintiff Sweeney has notified Defendant UPS of his disability and has requested reasonable accommodations that enable Plaintiff Sweeney to perform the essential functions of his job.
- 8. In particular, Plaintiff Sweeney has requested an accommodation consisting of limiting his employment duties to the pre-sort position at the Defendant's shipping facility in Brewer, Maine.
- 9. Without formally approving Plaintiff Sweeney's requested accommodations,
 Defendant UPS has generally allowed Plaintiff Sweeney to work at the pre-sort position.
- 10. Periodically, and most recently on June 22, 2019, Defendant UPS requested Plaintiff to work as a floater which is contrary to the reasonable accommodations Plaintiff Sweeney needs to perform the essential functions of his job.
- 11. When Plaintiff Sweeney objects to the denial of his accommodations, Defendant UPS has sought to discipline Plaintiff Sweeney, but those disciplinary efforts have been overturned by union grievance procedures.
- 12. Defendant UPS's refusal to honor Plaintiff's necessary accommodations violate his rights under the Maine Human Rights Act.

Wherefore, Plaintiff Sean Sweeney requests the court to enter a judgment in his favor against Defendant UPS Supply Chain Solutions, Inc.,

(a) Provides prospective injunctive relief that orders Defendant UPS Supply

Chain Solutions, Inc. to continuously honor Plaintiff Sweeney's reasonable

accommodations and that prohibits Defendant UPS from requiring or requesting Plaintiff

Sweeney to perform other job descriptions outside of his own job description as a "presorter,"

- (b) Awards compensatory or nominal damages;
- (c) Awards punitive damages;
- (d) Awards lost income;
- (e) Awards attorney's fees, interest and costs; and
- (f) Awards any further relief the court deems just.

Dated: May 26, 2021

Brett D. Baber, Esq., Bar No. 3143

Lanham Blackwell & Baber, P.A.

Attorney for Plaintiff Sean Sweeney

133 Broadway

Bangor, ME 04401

(207) 942-2898

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SUPERIOR COURT	•	DISTRICT	COURT
Penobscot, ss.		Location	<u></u>
Docket No.		Docket No.	
SEAN SWEENEY	Plaintiff		
V		SUMMO	NS
UPS SUPPLYCHAINSOLUTI	Defendant Defendant	M.R.Civ.P.	. 4(d)
INC., 48 Atlantic Avenu Brewer, ME 04412		Corporation	Service by Age
The Plaintiff has begun a lawsur sessions at (street address)	County of attorney MUST plaint WITHIN 2 ttorney must serve the Plaintiff's attorney and address appe with the court by the	Penobsect, Ma PREPARE AND SER O DAYS from the day your Answer by deliverable, whose name and copy of it in person ar below. You or your mailing it to: Clerk of (Indor, City) ed. Court rules govern naine.gov.	ine. If you wish to RVE A WRITTEN this Summons was ering a copy of it in address, including or by mail to the attorney must also District) (Superior) faine O4401 (Zip) ing the preparation
important warning: In or if, after you answer, you fai judgment by default may be entered or other relief demanded in the pay part of your wages to the P and your real estate may be tall lawsuit, do not fail to answer were	I to appear at any ntered against you Complaint. If this laintiff or your poxen to satisfy the	vime the Court notification to the court notification occurs, your employer ersonal property, including judgment. If you interpretation	es you to do so, a he money damages may be ordered to ling bank accounts
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Date: May 26, 2021			
Brett D. Baber, Esq.	(Attorney for) Plaintif	f (Seal	of Court)
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Bangor, ME 04401	T-11	Quete	MELLINE
20-9942-2898 hbaber (2) lanham	Telephone <u>Email Address</u>		Clark
blackwell.com	1	HARRY MCK	ENNEY
Dimmi Mr		HARRY MCK CHIEF CIVIL	DEDULA 3057
CV-030, Rev. 07/18		CHIEL CIVIL	

STATE OF MAINE

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	□ to the above-named Defendant in hand.					
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	Defendant.	· · · · · · · · · · · · · · · · · · ·				
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